

June 6, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington D.C. 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY


In Re: **PR Docket No. 92-235 (Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio Services)**

Dear Mr. Caton:

On June 5, 1995, the attached letter was distributed to the various
Commissioners' offices and to staff of the Wireless Telecommunications Bureau. It
should be associated with the above referenced docket file.

Please call me at (202) 467-4770 should you have any questions on this matter.

Sincerely,


Robert L. Hoggarth
Director, Regulatory Relations

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June 5, 1995

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20054

**Re: PR Docket No. 92-235 -- "Refarming" of the Private Land Mobile
Radio Spectrum Below 512 MHz.**

Dear Chairman Hundt:

Over the past four years, the private land mobile radio users have worked diligently to assist the Commission with its plans to restructure the private land mobile radio services operating below 512 MHz. This "Refarming" proceeding has demanded that the users divert huge levels of resources to develop a workable transition for the industry's migration to this new regulatory framework.

We believe that the success of Refarming is highly dependant upon the amount of time the FCC provides users to absorb the burden of transitioning to new technology. To this end, the undersigned parties -- who represent a prominent, majority segment of the users most affected by Refarming -- strongly support a transition strategy that would first require manufacturers to introduce "type-accepted" 12.5 kHz radios as of January 1, 1997, and, second, require manufacturers to introduce "type-accepted" 6.25 kHz radios as of January 1, 2005. As of those dates, manufacturers would be unable to seek FCC equipment approvals for new equipment lines built under the former technical standards and new users would be required to utilize the new technology. In adopting such a plan, the Commission would be reducing the standard channelwidth by 75 percent in ten years, which would be an unprecedented action in U.S. spectrum management history.

We understand that some members of your staff would instead recommend an earlier date for the introduction of 6.25 kHz radios. While the science to build various types of 6.25 kHz radios may now exist, there are significant reasons for the deferral of any mandatory introduction until 2005. Of course, we would not object to a solution that provides for early voluntary deployment of 6.25 kHz equipment, or any alternative technology, provided appropriate interference safeguards are included.

First, the migration to 6.25 kHz technology is a radical departure from existing technology and will require the development and deployment of an entirely new infrastructure platform and a whole new family of ancillary radio products. Standards development is a critically important issue for the users as they allow for the identification and specification of user needs; ensure multiple sources of vendors for equipment purchases; and enhance interoperability among different radios while limiting interference. We believe that the year 2005 would provide the minimum amount of time necessary to coordinate and facilitate the development of voluntary standards for the full range of new products needed to support our reliance on this new technology.

Second, the U.S. Government's land mobile radio users are also planning to migrate to more narrowband technology. At this time, the Government has not planned to reduce channelwidths below 12.5 kHz. Extending the transition date for private users until 2005 will thus result in better coordination with the efforts of the Government and provide manufacturers with a broader customer base for greater economies of scale.

Third, public safety radio users are finalizing their five year effort to develop a transition plan for the migration to digital technologies. Early implementation of 6.25 kHz technology will undo their hard work and render this effort meaningless.

Please realize that this is a **HUGE** issue for our industries. Our members have spent more than 20 billion dollars in infrastructure costs alone to harvest this spectrum. Given the critical nature of private land mobile systems, it is our joint responsibility to ensure that their efforts are cultivated rather than uprooted by "Refarming."

Sincerely,

American Petroleum Institute

By: Wayne Black
Wayne Black, Esq.
Its Attorney

APCO-International, Inc.

By: Robert M. Gurss
Robert M. Gurss, Esq.
Its Attorney

Association of American Railroads

By: Thomas J. Keller
Thomas J. Keller, Esq.
Its Attorney

Utilities Telecommunications Council

By: Jeffrey L. Sheldon
Jeffrey L. Sheldon, Esq.
General Counsel

**Industrial Telecommunications
Association, Inc.**

By: Mark E. Crosby
Mark E. Crosby
President and CEO

**International Association of Fire
Chiefs, Inc. and International
Municipal Signal Association**

By: Martin W. Bercovici
Martin W. Bercovici, Esq.
Its Attorney

PCIA, Inc.

By: Robert L. Hoggarth
Robert L. Hoggarth
Director, Regulatory Relations